

COOLEY GODWARD KRONISH LLP  
MICHAEL G. RHODES (116127) (rhodesmg@cooley.com)  
OLEG CROSS (246680) (ocross@cooley.com)  
4401 Eastgate Mall  
San Diego, CA 92121  
Telephone: (858) 550-6000  
Facsimile: (858) 550-6420

Attorneys for Defendant  
PAYPAL, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

B. DAVID MEHMET,  
Plaintiff,  
v.  
PAYPAL, INC.,  
Defendant.

Case No. 5:08-cv-01961-RMW

**DECLARATION OF OLEG CROSS IN  
SUPPORT OF MOTION FOR A  
PROTECTIVE ORDER RE: PLAINTIFF'S  
ATTEMPT TO DEPOSE SCOTT  
THOMPSON, JOHN D. MULLER, AND  
MARY M. HENTGES**

DATE: April 1, 2009  
TIME: 9:30 a.m.  
CTRM: 4, Fifth Floor  
JUDGE: Hon. Richard Seeborg

1 I, Oleg Cross, declare as follows:

2 I am an associate with the law firm of Cooley Godward Kronish LLP, attorneys for  
3 Defendant PayPal, Inc. ("PayPal") in the above-captioned action. I submit this declaration in  
4 support of PayPal's Motion For A Protective Order Re: Plaintiff's Attempt To Depose Scott  
5 Thompson, John D. Muller, and Mary M. Hentges. I am fully familiar with the facts set forth  
6 herein and, if called as a witness, would competently testify thereto.

7 1. On February 26, 2009, I conducted a telephonic conference with B. David  
8 Mehmet, Plaintiff in the above-captioned action. In that conversation, Mr. Mehmet and I agreed  
9 on the noticed date and time of the hearing for this motion.

10 I hereby declare under penalty of perjury under the laws of the United States and the State  
11 of California that the foregoing is true to the best of my knowledge.

12 Dated: February 26, 2009

13  
14  
15 /s/ Oleg Cross

OLEG CROSS

16 COOLEY GODWARD KRONISH LLP  
17 MICHAEL G. RHODES (116127)  
18 (rhodesmg@cooley.com)  
19 OLEG CROSS (246680)  
20 (ocross@cooley.com)  
21 4401 Eastgate Mall  
22 San Diego, CA 92121  
23 Telephone:(858) 550-6000  
24 Facsimile:(858) 550-6420  
25  
26  
27  
28